

Received & Inspected

April 18, 2014

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FCC Mail Room

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: In the Matter of Modernizing the E-Rate Program for Schools and Libraries,
WC Docket No. 13-184.**

Dear Ms. Dortch:

Emanuel County School System respectfully submits these comments in response to the March 6, 2014, Public Notice released by the Federal Communications Commission requesting further comment on modernization of the E-rate program.

Elimination of E-Rate support for voice services, including wireless voice services, will not contribute to the Commission's stated goal of expanding broadband penetration in schools and libraries. Emanuel County School System uses wireless voice service to communicate within the school's campus and to communicate with school buses while they are transporting students. Broadband and VoIP are not currently adequate substitutes for this type of critical voice communication and it is unlikely they will become so for many years in the rural area in which we are located.

Moving E-Rate funds from support of traditional voice services to support broadband expansion will not result in the outcome the Commissions desires. In most instances, funding is a zero-sum game for most schools. If the voice service schools desire no longer receive E-Rate support, the schools are left with little choice but to offset this change by reducing the amount they otherwise planned to spend elsewhere, including broadband expansion. The proposal to eliminate support for voice services is seriously flawed because it ignores local needs and self-determination in favor of centrally-planned networks created by regulatory fiat in the name of fostering broadband deployment. Centralized planning is inefficient and cannot take into account the rich diversity of school systems throughout the United States. The local schools and libraries are in the best position to know their needs.

If the Commission nonetheless decides to end support for wireless voice services, schools and libraries that currently use support for wireless voice services should be permitted to continue using support indefinitely, (i.e. "grandfathered"), for much services, and without needing to incur the burden of applying for a waiver. Also, grandfathered support should be

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allowed to grow over time as the cost of, or local need for, the grandfathered services increases. A school district should not have to stop using wireless voice services to protect students during transport to and from school, and while on school grounds, merely because the Commissions, with no specific knowledge of local needs, decides that available support would be better spent on a fixed broadband connection at the school itself.

For the reason set forth above, I respectfully urge the Commission to preserve and even expand support for full array mobile wireless services, including wireless, voice. If the Commission nonetheless chooses to phase out support for wireless voice services despite clear record evidence that they are "integral, immediate and proximate" to the education of students, particularly in rural areas, the Commission should grandfather wireless voice services for both existing and similarly schools and libraries.

Sincerely,

Vernon W. Hardy

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Director of Maintenance & Transportation

Emanuel County Schools System